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15	UNITED STATES DISTRICT COURT		
16	CENTRAL DISTRICT OF CALIFORNIA		
17	[UNDER SEAL],	CASE NO. CV 18-08311-ODW (AS)	
18	[UNDER SEAL],	DECLARATION OF ELIOT J. RUSHOVICH	
19	Plaintiffs,	IN SUPPORT OF <i>EX PARTE</i> APPLICATION FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT	
20	,		
21	V.	[FILED UNDER SEAL PURSUANT TO THE FALSE CLAIMS ACT, 31 U.S.C. §§ 3730(b)(2)]	
22		· / · / •	
23	[UNDER SEAL],	[FILED/LODGED CONCURRENTLY UNDER SEAL: <i>EX PARTE</i> APPLICATION FOR LEAVE TO FILE FOURTH AMENDED	
24	Defendants.	COMPLAINT; [PROPOSED] ORDER; [PROPOSED] FOURTH AMENDED	
25	Determents.	COMPLAINT]	
26	[FILED IN CAMERA AND UNDER SEAL		
27	PURSUANT TO 31 `U.S.C. § 3730(b)(2)]		
28	5		
	DECLARATION OF ELIOT J. RUSHOVICH IN SUPPORT OF <i>EX PARTE</i> APPLICATION FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT		

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DECLARATION OF ELIOT J. RUSHOVICH IN SUPPORT OF *EX PARTE* APPLICATION FOR LEAVE TO FILE FOURTH AMENDED COMPLAINT

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USC CARE MEDICAL GROUP, INC., a California corporation,

and

Defendants.

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DECLARATION OF ELIOT J. RUSHOVICH

I, Eliot J. Rushovich, declare as follows:

- I am an attorney duly licensed to practice before the Central District of California. I am Managing Partner of Rise Law Firm, PC, counsel of record for Plaintiff-Relator Justin Cheongsiatmoy ("Plaintiff-Relator") in this action and submit this declaration in support of Ex Parte Application for Leave to File Fourth Amended Complaint. I have personal knowledge of all matters set forth herein and, if called to testify thereto, could and would competently do so.
- On or about September 26, 2018, Relator IONM LLC ("Relator") filed in camera and under seal its initial Complaint against Defendants asserting violations of the Federal False Claims Act, the California False Claims Act and the California Insurance Frauds Prevention Act.
- On or about January 25, 2021, Relator filed in camera and under seal its First 3. Amended Complaint.
- 4. On or about May 5, 2021, Relator filed in camera and under seal its Second Amended Complaint, identifying Plaintiff-Relator Justin Cheongsiatmoy, M.D. ("Plaintiff-Relator") as an additional relator (collectively, "Relators") and adding his individual employment related claims.
- On or about June 25, 2021, Relators filed in camera and under seal their 5. Third Amended Complaint ("TAC").
 - The TAC is the operative complaint. 6.

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- 7. The TAC has not been served yet on Defendants because this case remains under seal pending completion of the government's ongoing investigation.
- 8. Litigation has not commenced, discovery has not yet begun and no case management order has been issued.
- 9. The TAC includes as the Seventeenth Cause of Action a placeholder for a cause of action under the Private Attorney General Act ("PAGA"), stating therein, among other things, that Plaintiff-Relator has notified the Labor Workforce Development Agency (the "LWDA") and Defendant University of Southern California of his intent to sue under PAGA but is awaiting the conclusion of the statutory period during which the LWDA could notify him of whether it intended to investigate.
- 10. The statutory period has since concluded and Plaintiff-Relator has received no notice from the LWDA of an intent to investigate.
- 11. Labor Code § 2699.3(a)(2)(C) specifies that a plaintiff's ability to amend an existing complaint to add a PAGA cause of action as a "matter of right" is limited to a period of sixty (60) days following the statutory period during which the LWDA could notify him of whether it intended to investigate. Based on the timing of when Plaintiff-Relator should have received notice, the deadline to amend his existing complaint hereunder to add a PAGA cause of action as a "matter of right" pursuant to Labor Code § 2699.3(a)(2)(C) is September 13, 2021.
- 12. On July 13, 2021, Plaintiff-Relator's counsel myself and co-counsel Alice Chang discussed on a phone call with Frank D. Kortum, Assistant United States Attorney for the United States of America, the need to amend the TAC to add a cause of action under PAGA. On the call, Mr. Kortum specifically requested to us that when Plaintiff-Relator was ready to amend, that he should attempt to seek stipulation from all government entities, similar to what was done in connection with the Third Amended Complaint.

- 13. After diligently preparing a draft Fourth Amended Complaint and associated stipulation, my co-counsel Alice Chang by email presented all government entities with the draft stipulation for a request of leave to allow Plaintiff-Relator to amend the TAC to add the PAGA cause of action.
- 14. In response, three of the four government entities signed the stipulation, including Mitchell Neumeister from the California Department of Insurance Fraud Liaison Bureau, John Fisher from the California Attorney General Bureau of Medi-Cal Fraud and Elder Abuse, and Frank Kortum from the U.S. Department of Justice. A true and correct copy of the partially executed stipulation is attached hereto as **Exhibit A**.
- 15. Unfortunately, Plaintiff-Relator was unable to obtain sign off from the Los Angeles County District Attorney's Office despite repeated attempts to call and email such party, attempts that took place up until this very morning.
- 16. However, I have received no indication, and I am aware that my co-counsel has received no indication, that the Los Angeles County District Attorney's Office or any other government party affirmatively opposes this amendment.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed this 7th Day of September, 2021 in Laguna Hills, California.

ELIOT J. RUSHOVICH



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24	Defendante		
25	Defendants.	Defendants.	
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28			

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and

USC CARE MEDICAL GROUP, INC., a California corporation,

Defendants.

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IT IS HEREBY STIPULATED AND AGREED by and among *qui tam* plaintiffs IONM LLC and Justin Cheongsiatmoy, M.D. ("Relators"), the United States of America ("United States"), the State of California, and Los Angeles County, by their respective attorneys of record and subject to the approval of the Court, that:

- (1) Relators may file a Fourth Amended Complaint; and
- (2) pursuant to 31 U.S.C. § 3730(b)(3), the Fourth Amended Complaint shall be filed under seal.

Justin Cheongsiatmoy, M.D. seeks to amend to add a cause of action under the California Private Attorney General Act ("PAGA"); this amendment is permitted as a "matter of right" pursuant to California Labor Code § 2699.3(a)(2)(C). In the current Third Amended Complaint, Justin Cheongsiatmoy, M.D. included as the Seventeenth Cause of Action a placeholder for a PAGA cause of action, stating therein, among other things, that he had notified the Labor Workforce Development Agency (the "LWDA") and Defendant University of Southern California of his intent to sue under PAGA and was awaiting the conclusion of the statutory period during which the LWDA could notify him of whether it intended to investigate. The statutory period has since concluded and Justin Cheongsiatmoy, M.D. received no notice from the LWDA of an intent to investigate. Justin Cheongsiatmoy, M.D. is now permitted to sue under PAGA and seeks to formally add his PAGA claims to this lawsuit. Finally, while the United States has represented that there will be a settlement meeting with the Defendants in the future, the Defendants have not received a copy of Second Amended Complaint nor have Defendants received a copy of the Third Amended Complaint; therefore, there is no undue delay or prejudice because the case remains sealed and the government is still investigating.

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1	Dated: September 1, 2021	WILBANKS AND GOUINLOCK, LLP
2		WILDANKS AND GOOMLOCK, LLI
3		By: <u>/s/ Marlan . Wilbanks</u> MARLAN B. WILBANKS
4		Attornava for Palators
5		Attorneys for Relators
6	Dated: September 1, 2021	RISE LAW FIRM, PC
7	Batea. September 1, 2021	
8		By: ELIOT J. RUSHOVICH
9		Attorneys for Justin Cheongsiatmoy, M.D., in his individual capacity
10		M.D., in his individual capacity
11	Dated: September 1, 2021	$\Delta \mathbf{s}$
12		By:
13		ALICE CHANG
14		Attorneys for Relators and Justin
15		Cheongsiatmoy, M.D. in his individual capacity
16		cupacity
17	Dated: September 2, 2021	CALIFORNIA DEPARTMENT OF
18		INSURANCE FRAUD LIASON BUREAU
19		Dru Aff
20		By: MITCHELL NEUMEISTER
21		A44
22		Attorneys for the State of California
23	Dated: September 2, 2021	CALIFORNIA ATTORNEY GENERAL
24		BUREAU OF MEDI-CAL FRAUD AND
25		ELDER ABUSE
26		By: JOHN FISHER
27		Attorneys for the State of California
28		

1	Dated: [], 2021	LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE
2		By:
3 4		STEVEN FRANKLAND Head Deputy, Healthcare Insurance Fraud Division
5		Attorneys for Los Angeles County
6		
7		TRACY L. WILKISON Acting United States Attorney
8		ABRAHAM C. MELTZER
9		Assistant United States Attorney Chief, Civil Fraud Section
10	Datade Cantonshan 2 2021	By: Frank Kortun
11	Dated: September 2, 2021	FRANK D. KORTUM
12		Assistant United States Attorney Attorneys for the United States of
13		America
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